

**OFFICIAL FILE**  
**ILLINOIS COMMERCE COMMISSION**

**ORIGINAL**  
ILLINOIS  
COMMERCE COMMISSION

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION Jan 16 10 52 AM '02

CENTRAL ILLINOIS PUBLIC SERVICE  
COMPANY d/b/a AmerenCIPS, UNION  
ELECTRIC COMPANY, d/b/a AmerenUE,  
CENTRAL ILLINOIS LIGHT COMPANY,  
COMMONWEALTH EDISON COMPANY,  
ILLINOIS POWER COMPANY,  
MIDAMERICAN ENERGY COMPANY,  
NORTHERN ILLINOIS GAS COMPANY  
d/b/a NICOR GAS COMPANY,  
NORTH SHORE GAS COMPANY,  
and THE PEOPLES GAS LIGHT AND  
COKE COMPANY

CHIEF CLERK'S OFFICE

No. 01-0644

Petition To Initiate Rulemaking With Notice and  
Comment for Approval of an Additional Method  
To Determine When Deposits May Be Required  
From Applicants For Residential Service, In Addition  
To Those Methods Set Forth In 83 Ill. Admin.  
Code § 280.50(a).

**AMENDED VERIFIED JOINT PETITION**

Central Illinois Public Service Company d/b/a AmerenCIPS ("AmerenCIPS"), Union Electric Company d/b/a AmerenUE ("AmerenUE"), Central Illinois Light Company ("CILCO"), Commonwealth Edison Company ("ComEd"), Illinois Power Company ("IP"), MidAmerican Energy Company ("MidAmerican"), Northern Illinois Gas Company d/b/a Nicor Gas Company ("Nicor Gas"), North Shore Gas Company ("North Shore"), and The Peoples Gas Light and Coke Company ("Peoples Gas") (collectively "the Companies") hereby petition the Illinois Commerce Commission (the "Commission"), pursuant to Sections 200.210 and 280.30 of the Illinois Administrative Code (the "Administrative Code"), 83 Ill. Admin. Code §§ 200.210 and 280.30, to initiate a rulemaking proceeding for authorization to utilize an additional method for making determinations with respect to when deposits may be required from applicants for residential service, in addition to those specified in 83 Ill. Admin. Code §280.50(a). Granting

this Amended Petition will permit public utilities that have filed a tariff in accordance with the proposed revision to Section 280.50 to use a risk assessment analysis of the credit history of applicants for residential service in determining whether to require payment of deposits. Using a risk assessment analysis is expected to better identify circumstances where deposits should be required. The relief requested by this Amended Petition was previously granted by the Commission on a two-year pilot program basis with respect to Nicor Gas in ICC Docket No. 97-0635, which authorization was extended an additional two years in ICC Docket No. 00-0330. In support of this Amended Petition, the Companies state as follows:

1. AmerenCIPS is a corporation organized and existing under the laws of the State of Illinois with its principal office in Springfield, Illinois. AmerenCIPS is a combination gas and electric utility, and is a public utility within the meaning of § 3-105 of The Illinois Public Utilities Act (220 ILCS § 5/3-105), as amended (the "Act"). AmerenCIPS provides electric service to approximately 325,000 customers and gas service to approximately 170,000 customers in the State of Illinois.

2. AmerenUE is a corporation organized and existing under the laws of the State of Missouri with its principal office in St. Louis, Missouri. AmerenUE is a combination gas and electric utility, and is a public utility within the meaning of § 3-105 of the Act. AmerenUE provides electric service to approximately 61,000 customers and gas service to approximately 18,000 customers in the State of Illinois.

3. CILCO is a corporation organized and existing under the laws of the State of Illinois with its principal office in Peoria, Illinois. CILCO is a combination gas and electric utility, and is a public utility within the meaning of § 3-105 of the Act. CILCO provides electric service to approximately 200,000 customers and gas service to approximately 205,000 customers

in the State of Illinois.

4. ComEd is a corporation organized and existing under the laws of the State of Illinois with its principal office in Chicago, Illinois. ComEd is engaged in delivering electricity to the public in the northern portion of the State of Illinois, and is a public utility within the meaning of § 3-105 of the Act. ComEd delivers energy to approximately 3.5 million customers in the northern portion of the State of Illinois.

5. IP is a corporation organized and existing under the laws of the State of Illinois with its principal office in Decatur, Illinois. IP is a public utility within the meaning of § 3-105 of the Act and supplies approximately 650,000 natural gas and electricity customers in the State of Illinois.

6. MidAmerican is an Iowa corporation with its principal office in Des Moines, Iowa. MidAmerican is a public utility within the meaning of § 3-105 of the Act and supplies approximately 83,500 electric and 65,500 natural gas customers in the State of Illinois.

7. Nicor Gas is an Illinois corporation with its headquarters located in Naperville, Illinois. Nicor Gas is a public utility within the meaning of § 3-105 of the Act and is engaged in the business of distributing and selling gas to approximately 1.9 million customers in the northern part of the State of Illinois.

8. North Shore Gas is a corporation organized and existing under the laws of the State of Illinois, having its principal office at 130 East Randolph Drive, Chicago, Illinois 60601. It is engaged in the business of purchasing natural gas for, and storing distributing, selling and transporting natural gas to over 149,000 customers within northeastern Cook County and Lake County, Illinois. North Shore Gas is a public utility within the meaning of the Act.

9. Peoples Gas is an Illinois corporation with its general office in Chicago, Illinois. Peoples Gas is a public utility within the meaning of § 3-105 of the Act and is engaged principally in the business of purchasing natural gas for, and storing, distributing, selling and transporting natural gas to approximately 840,000 customers in the City of Chicago.

10. 83 Ill. Admin. Code § 280.50(a) provides that “if, after a review of its own past service records, a utility finds that an applicant for residential service has failed to pay for past due utility service for the same class of service furnished to him/her at the same or at another address, a utility may refuse to provide service, unless the applicant, at the option of the utility, pays any past due bill and/or provides a deposit pursuant to § 280.70 ...” of the Administrative Code. No other grounds for requiring a deposit from an applicant for residential service are provided for in the Act or in the Commission’s rules.

11. On October 16, 2001, the Companies filed a Verified Joint Petition in which they requested that the Commission grant a waiver of 83 Ill. Admin. Code § 280.50(a) authorizing the use of an alternative method for making credit history determinations for new applicants for residential service in addition to that method currently authorized. An initial status hearing was conducted on November 1, 2001. During informal discussions, a concern was raised that the relief requested in the Joint Verified Petition could be more appropriately granted on a permanent basis pursuant to the Commission’s rulemaking procedures. While the Companies view the Joint Verified Petition as legally sufficient, the Companies acknowledge that rulemaking is a lawful method for proceeding.

12. The Companies therefore request that the Commission initiate a rulemaking proceeding for the amendment of Section 280.50(a) to permit the use of a credit scoring assessment method for residential service applicants. The amended Section 280.50(a) would

authorize utilities that have filed a tariff consistent with the amended Section to, at their option, collect requested deposits from certain residential applicants based upon a risk-assessment analysis of the applicant's credit history. The rulemaking would seek to add minor changes to Section 280.50(a) to include this method of new applicant risk assessment. The proposed amendment to Section 280.50(a) is set forth in the blacklined document attached as Exhibit A to this Amended Petition.

13. There are several reasons that make this requested amendment to Section 280.50(a) reasonable, and well-suited for the notice and comment method of rulemaking, foremost being that the Commission has twice previously granted, on a pilot program basis, the same relief requested in this Amended Petition. In ICC Docket No. 97-0635, Nicor Gas filed an application requesting that the Commission consent to and approve a waiver of 83 Ill. Admin. Code § 280.50(a) to permit Nicor Gas to conduct a two-year pilot program in which it would be allowed to bill a deposit to certain applicants for gas service based on a risk assessment analysis of their credit history. In that proceeding, the Commission found that "good cause exists to allow a waiver of 83 Ill. Adm. Code 280.50(a) as requested in Nicor Gas' petition" and granted the requested waiver. ICC Docket No. 97-0635 (Order, April 27, 1998, at 5). Nicor's pilot program was further extended as described below.

14. The credit scoring method proposed by the Companies is consistent with that employed by Nicor Gas in its pilot program. Each of the Companies choosing to participate would use a reputable credit reporting agency, such as Equifax, that can create validated models for predicting the likelihood that an applicant will pay for utility service on a timely basis. At the time of application, or while the applicant for residential service is on the telephone, the customer information provided would be validated, and the model would assess the applicant's

credit risk and generate a credit score. A predetermined threshold figure derived with the assistance of the credit reporting agency from each participating Company's customer data would provide the baseline against which the result would be compared. A credit score meeting or exceeding the predetermined threshold would return an instruction "no deposit required," while a credit score below the credit threshold would generate a message suggesting either that a deposit may be required, or that further information would be needed.

15. Through the pilot program, Nicor Gas determined that using a risk assessment analysis of applicants' credit history resulted in better identification of the need for a deposit. Nicor Gas' experience, which has been shared in detail with Staff through reports on its experimental program, has been that there is a strong correlation between customers for whom deposits have been required based upon credit scoring, and those who become in arrears with respect to Nicor Gas service. Nicor Gas also found that use of the credit scoring methodology helped prevent fraud in obtaining service through the use of false identification. Nicor Gas found that customer acceptance of the pilot program was high, and that the program, to Nicor Gas' knowledge, did not result in any formal complaints being filed with the Commission.

16. On July 19, 2000 in ICC Docket No. 00-0330, the Commission granted Nicor Gas a two-year extension of its credit scoring pilot program. In extending Nicor Gas' waiver of Section 280.50(a) and granting permission for continued use of the credit risk assessment program, the Commission stated that "[w]e also give weight to [the Commission's] Staff's lack of objection to the continuation of [the] program and its continuing monitoring of the program."

*Id.* at 2.

17. The Companies believe it would be beneficial to broaden the availability of the credit risk assessment method for deposits on a uniform basis among utilities. Nicor Gas' experience with the pilot program demonstrates that approving this petition and, after notice and comment, granting the proposed amendment to Section 280.50(a) with respect to applicants for residential service from the Companies is likely to have several benefits. These include the accurate identification of those customers from whom a deposit should be requested, the use of customer credit data from reputable sources that remains strictly confidential, and application of a consistent and unbiased credit methodology that is widely accepted in modern commerce.

WHEREFORE, Central Illinois Public Service Company, Union Electric Company, Central Illinois Light Company, Commonwealth Edison Company, Illinois Power Company, MidAmerican Energy Company, Northern Illinois Gas Company, North Shore Gas Company, and The Peoples Gas Light and Coke Company request that the Commission enter an order initiating a rulemaking proceeding pursuant to 83 Ill. Admin. Code § 200.210 seeking notice and comment on the proposed amendment to 83 Ill. Admin. Code § 280.50(a) which would authorize utilities to, at their option and after filing of a tariff complying with the rule, collect requested deposits from certain residential applicants based upon a risk-assessment analysis of the applicant's credit history as an additional method to those set forth in 83 Ill. Admin. Code § 280.50(a) for making determinations with respect to when deposits may be required from applicants for residential service. The Companies further request that the Commission waive hearing with respect to the proposed amended rule and initiate a rulemaking proceeding by publishing a notice of proposed rulemaking in the Illinois Register in materially the form attached hereto as Exhibit A.

Dated at Chicago this 15th day of January, 2002.

Respectfully submitted,

CENTRAL ILLINOIS PUBLIC  
SERVICE COMPANY d/b/a  
AMERENCIPS and UNION ELECTRIC  
COMPANY d/b/a AMERENUE

CENTRAL ILLINOIS LIGHT COMPANY

Thomas M. Byrne / RSA  
Thomas M. Byrne  
Associate General Counsel  
Ameren Services  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149, MC 1310  
St. Louis, MO 63166-6149  
(314) 554-2514  
Fax: (314) 554-4014  
Email: tbyrne@ameren.com

Edward J. Griffin / RSA  
Edward J. Griffin  
Attorney at Law  
Defrees & Fiske  
200 South Michigan Avenue  
Chicago, Illinois 60606  
(312) 372-4000  
Fax: (312) 939-5617  
Email: EJG@defrees.com

COMMONWEALTH EDISON COMPANY

ILLINOIS POWER COMPANY

Bryan S. Anderson  
Bryan S. Anderson  
Attorney at Law  
Foley & Lardner  
Three First National Plaza  
Chicago, Illinois 60602  
(312) 755-1900  
Fax: (312) 558-7778  
Email: banderson@foleylaw.com

Shig Yasunaga / RSA  
Joseph Lakshmanan  
Shig Yasunaga  
Attorneys For Illinois Power Company  
500 South 27<sup>th</sup> Street  
Decatur, Illinois 62525  
(217) 362-7449  
Fax: (217) 362-7458  
Email: Joseph\_Lakshmanan@Illinoispower.com  
Shig\_Yasunaga@Illinoispower.com



MIDAMERICAN ENERGY COMPANY

Karen M. Huizenga / RSA  
Karen M. Huizenga  
Attorney at Law  
MidAmerican Energy Company  
106 East Second Street  
P.O. Box 4350  
Davenport, Iowa 52808  
(563) 333-8006  
Fax: (563) 333-8021  
Email: Kmhuizenga@midamerican.com

NORTH SHORE GAS COMPANY and  
THE PEOPLES GAS LIGHT AND COKE  
COMPANY

Brian McCarthy / RSA  
Brian McCarthy  
Matthew A. Greene  
Gerard T. Fox  
James T. Hinchliff  
Attorneys for The Peoples Gas Light  
and Coke Company &  
North Shore Gas Company  
130 East Randolph Drive, 23rd Floor  
Chicago, Illinois 60601  
(312) 240-4415  
Fax: (312) 240-4486  
Email: b.mccarthy@pecorp.com

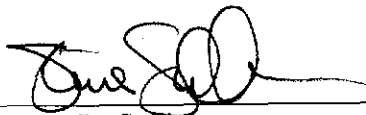
NORTHERN ILLINOIS GAS COMPANY

Stephen J. Mattson / RSA  
Stephen J. Mattson  
Attorney at Law  
Mayer, Brown & Platt  
190 South LaSalle Street  
Chicago, Illinois 60603  
(312) 701-7082  
Fax: (312) 706-9177  
Email: Smattson@mayerbrown.com

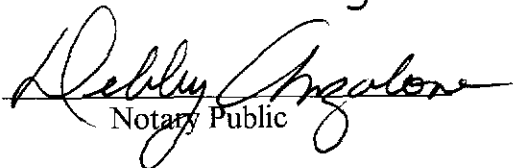
STATE OF MISSOURI     )  
                                  )ss  
CITY OF ST. LOUIS     )

**VERIFICATION**

I, Steven R. Sullivan, being first duly sworn, state that I am Vice President, General Counsel & Secretary of UNION ELECTRIC COMPANY d/b/a AmerenUE and CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

  
\_\_\_\_\_  
Steven R. Sullivan  
Vice President, General Counsel & Secretary

Subscribed and Sworn to before me  
this 11th day of JANUARY, 2002.

  
Notary Public

**DEBBY ANZALONE**  
Notary Public - Notary Seal  
STATE OF MISSOURI  
St. Louis County  
My Commission Expires: April 18, 2002

STATE OF ILLINOIS       )  
                                      )ss  
COUNTY OF PEORIA       )

**VERIFICATION**

I, Robert J. Sprowls, being first duly sworn, state that I am President of CENTRAL ILLINOIS LIGHT COMPANY, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

Robert J. Sprowls  
Robert J. Sprowls  
President

Subscribed and Sworn to before me  
this 10th day of January, 2002.

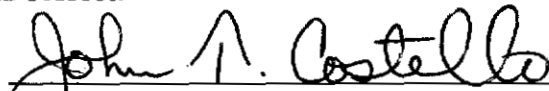
Laurie Greenleaf  
Notary Public




STATE OF ILLINOIS     )  
                                  )ss  
COUNTY OF COOK     )

**VERIFICATION**

I, John T. Costello, being first duly sworn, state that I am Vice President of  
COMMONWEALTH EDISON COMPANY, that I have read the foregoing Amended Verified  
Joint Petition, that I am familiar with the facts stated therein, and that to the best of my  
information and belief, the facts are true and correct.

  
\_\_\_\_\_  
John T. Costello  
Vice President  
Commonwealth Edison Company

Subscribed and Sworn to before me  
this 14<sup>th</sup> day of January, 2002.


  
\_\_\_\_\_  
Notary Public



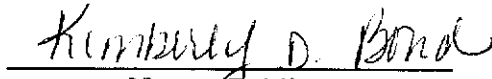
STATE OF ILLINOIS     )  
                                      )  
COUNTY OF MACON     )     ss

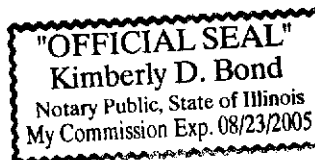
**VERIFICATION**

I, Roseanna Wiegand, being first duly sworn, state that I am the Manager of Revenue Management of ILLINOIS POWER COMPANY, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

  
\_\_\_\_\_  
Roseanna Wiegand  
Manager of Revenue Management

Subscribed and Sworn to before me  
this 11 day of Jan, 2002.


  
\_\_\_\_\_  
Notary Public




STATE OF ILLINOIS                    )  
  )ss  
COUNTY OF ROCK ISLAND        )

**VERIFICATION**

I, David L. Graham, being first duly sworn, state that I am Vice President of Customer Service Operations MIDAMERICAN ENERGY COMPANY, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

  
\_\_\_\_\_  
David L. Graham  
Vice President of Customer Service Operations

Subscribed and Sworn to before me  
this 11<sup>th</sup> day of January, 2002.

  
\_\_\_\_\_  
Notary Public



STATE OF ILLINOIS       )  
                                      )ss  
COUNTY OF DuPAGE     )

**VERIFICATION**

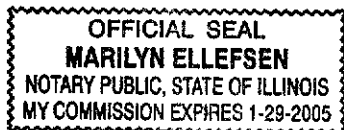
I, Rocco J. D'Alessandro, being first duly sworn, state that I am Vice President of Customer and Distribution Services of NORTHERN ILLINOIS GAS COMPANY, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

*Rocco J. D'Alessandro*

Rocco J. D'Alessandro  
Vice President of  
Customer and Distribution Services

Subscribed and Sworn to before me  
this 10<sup>th</sup> day of January, 2002.

*Marilyn Ellefsen*  
Notary Public



The address is  
here

STATE OF ILLINOIS       )  
                                      )ss  
COUNTY OF COOK       )

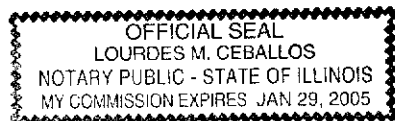
**VERIFICATION**

I, Katherine A. Donofrio, being first duly sworn, state that I am Vice President of THE PEOPLES GAS LIGHT AND COKE COMPANY and NORTH SHORE GAS COMPANY, that I have read the foregoing Amended Verified Joint Petition, that I am familiar with the facts stated therein, and that to the best of my information and belief, the facts are true and correct.

Katherine A. Donofrio  
Katherine A. Donofrio  
Senior Vice President

Subscribed and Sworn to before me  
this 10<sup>th</sup> day of JANUARY, 2002.

Loures M. Ceballos  
Notary Public





**PROOF OF SERVICE**

Bryan S. Anderson, one of the attorneys for Commonwealth Edison Company, hereby certifies that on January 15, 2002, he caused copies of each of the foregoing Amended Verified Joint Petition to be served on the persons at the addresses specified on the attached Service List by the method so indicated.

  
Bryan S. Anderson

**SERVICE LIST**  
**ICC DOCKET # 01-0644**

Ms. Donna Caton  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Ave.  
Springfield, Illinois 62701  
[dcaton@icc.state.il.us](mailto:dcaton@icc.state.il.us)  
**Federal Express**

Joan Howard  
Case Manager  
Illinois Commerce Commission  
527 East Capitol Ave.  
Springfield, Illinois 62701  
[jhoward@icc.state.il.us](mailto:jhoward@icc.state.il.us)  
**Federal Express**

Katherine A. Donofrio  
Vice President  
North Shore Gas Company &  
Peoples Gas Light and Coke Company  
130 E. Randolph Dr., 22<sup>nd</sup> Floor  
Chicago, Illinois 60601  
[k.donofrio@pecorp.com](mailto:k.donofrio@pecorp.com)  
**United States Mail**

Brian J. McCarthy, Matthew A. Greene,  
Gerald T. Fox & James Hinchliff  
Peoples Gas/North Shore  
130 E. Randolph Dr., 23<sup>rd</sup> Floor  
Chicago, Illinois 60601  
[gtfox@pecorp.com](mailto:gtfox@pecorp.com)  
[m.greene@pecorp.com](mailto:m.greene@pecorp.com)  
[j.hinchliff@pecorp.com](mailto:j.hinchliff@pecorp.com)  
[b.mccarthy@pecorp.com](mailto:b.mccarthy@pecorp.com)  
**Federal Express**

Edward J. Griffin  
Atty. For CILCO  
Defrees & Fiske  
200 S. Michigan Ave., Ste. 1100  
Chicago, Illinois 60604  
[ejg@defrees.com](mailto:ejg@defrees.com)  
**Federal Express**

William J. Showtis  
Administrative Law Judge  
Illinois Commerce Commission  
527 East Capitol Ave.  
Springfield, Illinois 62701  
[bshowtis@icc.state.il.us](mailto:bshowtis@icc.state.il.us)  
**Federal Express**

Thomas Byrne  
Ameren Services  
(MC 1310)  
P.O. Box 66149  
St. Louis, MO 63166  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)  
**Federal Express**

Leijuana Doss, Marie Spicuzza &  
Mark N. Pera  
Assistant State's Attorney  
Environment and Energy Division  
Cook County State's Attorney's Office  
69 W. Washington, Ste. 700  
Chicago, Illinois 60602  
[ldoss@cookcountygov.com](mailto:ldoss@cookcountygov.com)  
[mspicuz@cookcountygov.com](mailto:mspicuz@cookcountygov.com)  
**Federal Express**

Kathleen L. Halloran  
Executive Vice President  
Northern Illinois Gas Company  
d/b/a Nicor Gas Company  
PO Box 190  
Aurora, Illinois 60601  
[khallor@nicorinc.com](mailto:khallor@nicorinc.com)  
**United States Mail**

Karen M. Huizenga  
Attorney  
MidAmerican Energy Company  
106 E. Second St.  
PO Box 4350  
Davenport, Iowa 52808  
[kmhuizenga@midamerican.com](mailto:kmhuizenga@midamerican.com)  
**Federal Express**

Robert P. Jared  
Regulatory Law & Analysis  
MidAmerican Energy Company  
106 E. Second St.  
PO Box 4350  
Davenport, Iowa 52808  
[rpjared@midamerican.com](mailto:rpjared@midamerican.com)  
**Federal Express**

Julie B. Lucas  
Legal Counsel  
Citizens Utility Board  
208 South LaSalle Street, Suite 1760  
Chicago, IL 60604  
[jlucas@citizensutilityboard.org](mailto:jlucas@citizensutilityboard.org)  
**Federal Express**

Stephen J. Mattson  
Atty. for Northern Illinois Gas Company  
d/b/a Nicor Gas Company  
Mayer Brown & Platt  
190 S. LaSalle St.  
Chicago, IL 60603-3441  
[smattson@mayerbrown.com](mailto:smattson@mayerbrown.com)  
**Federal Express**

Robert J. Mill  
Central Illinois Public Service Company  
607 E. Adams St.  
Springfield, IL 62739  
[bob\\_mill@ameren.com](mailto:bob_mill@ameren.com)  
**Federal Express**

Anne R. Pramaggiore  
Associate General Counsel  
Commonwealth Edison Company  
One Financial Place, 33<sup>rd</sup> Floor  
Chicago, IL 60680-5398  
[anne.pramaggiore@exeloncorp.com](mailto:anne.pramaggiore@exeloncorp.com)  
**United States Mail**

Joseph L. Lakshmanan & Shig Yasunaga  
Illinois Power Company  
500 S. 27th St.  
Decatur, IL 62521-2200  
[joseph\\_lakshmanan@illinoispower.com](mailto:joseph_lakshmanan@illinoispower.com)  
**Federal Express**

Steven Matrisch & Janis Von Qualen  
Office of General Counsel  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701  
[smatrisc@icc.state.il.us](mailto:smatrisc@icc.state.il.us)  
[jvonqual@icc.state.il.us](mailto:jvonqual@icc.state.il.us)  
**Federal Express**

Kathryn Patton  
Sr. Vice President & General Counsel  
Illinois Power Company  
500 S. 27th St.  
Decatur, IL 62521-2200  
[kathy\\_patton@dynegy.com](mailto:kathy_patton@dynegy.com)  
**United States Mail**

Jeff Schirm  
MidAmerican Energy Company  
716 17th St.  
Moline, IL 61265  
[jaschirm@midamerican.com](mailto:jaschirm@midamerican.com)  
**United States Mail**

Simone Byvoets  
Assistant General Counsel  
Commonwealth Edison Company  
10 S. Dearborn, 35<sup>th</sup> Floor  
Chicago, Illinois 60602  
[simone.byvoets@exeloncorp.com](mailto:simone.byvoets@exeloncorp.com)  
**United States Mail**

Nick T. Shea  
Director, Rates & Regulatory Affairs  
Central Illinois Light Company  
300 Liberty St.  
Peoria, IL 61602  
[nshea@cilco.com](mailto:nshea@cilco.com)  
**United States Mail**

James A. Tiskos  
Corporate Assistant  
Union Electric Company  
Ameren Services Company  
607 E. Adams St.  
Springfield, IL 62739  
[jtiskos@ameren.com](mailto:jtiskos@ameren.com)  
**United States Mail**

Steven R. Sullivan  
Vice President  
Central Illinois Public Service Company &  
Union Electric Company  
One Ameren Plz.  
1901 Chouteau Ave.  
PO Box 66149, MC 1300  
St. Louis, MO 63166-6149  
[srsullivan@ameren.com](mailto:srsullivan@ameren.com)  
**United States Mail**